

National Aeronautics and
Space Administration

Lyndon B. Johnson Space Center
White Sands Test Facility
P.O. Box 20
Las Cruces, NM 88004-0020



May 9, 2007

Reply to Attn of: RA-E07-048


New Mexico Environment Department
Attn: Mr. Doug Hopinkah, Lead Inspector
Hazardous Waste Bureau, District 1
Compliance and Technical Assistance Program
5500 San Antonio Drive, NE
Albuquerque, NM 87109

Subject: NASA White Sands Test Facility (WSTF) Follow-Up Information Related to the
May 1, 2007 Hazardous Waste Compliance Inspection

On May 1-2, 2007, the New Mexico Environment Department (NMED) conducted an unannounced hazardous waste compliance inspection at the NASA White Sands Test Facility. During the outbrief meeting, a potential issue was identified with the LDR paperwork completed for manifest 3424568. On the LDR paperwork, columns 3 and 4 were marked appropriately for the D008 waste code, but columns 1 and 2 were not marked in the appropriate check boxes. Although the LDR check boxes were not marked correctly, the manifest, Clean Harbors profile documentation, and associated waste characterization information clearly indicated the D008 waste code was present.

NASA immediately contacted Clean Harbors to determine if there were any issues related to ensuring compliance with the appropriate LDR treatment standards for the D008 waste stream. The representative from the Clean Harbors Waste Profiling and Compliance Group informed NASA that the waste was appropriately treated as required by LDR treatment standards because the manifest itself, and the Clean Harbors profile, both clearly indicated the D008 waste code. Prior to treating any waste stream received at the Clean Harbors facility, the waste codes are entered into their tracking system using the manifest waste codes and the associated Clean Harbors profile information. As such, the waste was appropriately treated, even though the two check boxes were missed on the LDR paperwork. For information purposes, enclosed are copies of the Record of Call (ROC) detailing the conversation with Clean Harbors and an associated email between the WSTF Shipping Coordinator and the representative from the Clean Harbors Compliance Group. If you have any questions or comments concerning this submittal, or need any further supplemental information, please call me at 505-524-5733 or Tim Davis of my staff at 505-524-5024.

Original Signed By: Tim Davis

 Radel Bunker-Farrah
Environmental Program Manager

Enclosure

RA-E07-048

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bcc: (w/o encl.)
Team Easi/K. Davis

RA/RBunker-Farrak:btm:5/7/07:5733

S:\wstfgrp\environ\nasaport\Signed Transmission Letters\ RA-E07-048 Inspection Followup
2007.doc

RECORD OF CALL

DATE: May 2, 2007	TIME: 1500 hrs.
CALLING PARTY	RECEIVING PARTY
NAME: Tom Hall	NAME: Sherman Monson
ORG.: North Wind	ORG.: Clean Harbors
PHONE: 505-524-5453	PHONE: 435 843-4855

SUBJECT: Manifest 3424568

DISCUSSION: Status of LDR Notice

Contacted Mr. Sherman Monson of Clean Harbors Waste Profiling/Compliance Group. I informed Sherman that the accompanying LDR notice only included checks marks in columns 3 and 4 and that we had inadvertently omitted the check marks for columns 1 and 2 for the EPA Waste Coded D008. I informed Sherman that the D008 waste code was included on the manifest and Clean Harbors Profile CH117194. I asked Sherman if this was a compliance issue with respect to LDR treatment standards. Sherman informed me that as long as the waste code was on the manifest and the profile, Clean Harbors treated the waste coded with respect to LDR treatment standards.

cc: Tim Davis, Esmeralda Alvarez, Ray Spencer

From: Hall, Tom A. (WSTF-1600)[LYNX]
Sent: Wednesday, May 02, 2007 12:19 PM
To: Spencer, Ray L. (WSTF-1620)[HON]
Cc: Davis, Timothy J. (WSTF-RA)
Subject: FW: Manifest 3424568

Attachments: Clean Harbors_RECCALL_05_02_07.DOC

From: MONSON, SHERMAN F [mailto:monson.sherman@cleanharbors.com]
Sent: Wednesday, May 02, 2007 12:14 PM
To: Hall, Tom A. (WSTF-1600)[LYNX]
Subject: RE: Manifest 3424568

That is good. Because when they receive the manifest, they enter those codes that are on the manifest.

Sherman F. Monson
Customer Service Rep
Tooele, Utah 84074
Phone 435-843-4855
Fax 435-843-5612

From: Hall, Tom A. (WSTF-1600)[LYNX] [mailto:tom.a.hall@nasa.gov]
Sent: Wednesday, May 02, 2007 12:05 PM
To: MONSON, SHERMAN F
Subject: Manifest 3424568

Sherman,

Per our conversation yesterday, I'm preparing a record of call (see attached). Could you please review the record of call to ensure that I have accurately described our conversation.

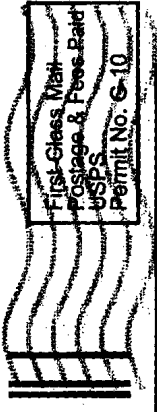
Thanks

Tom

<<Clean Harbors_RECCALL_05_02_07.DOC>>

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UNITED STATES POSTAL SERVICE



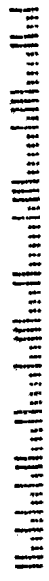
RA 03 MAY 2007 PM 3:11

• Sender: Please print your name, address, and ZIP+4 in this box •

National Aeronautics and
Space Administration

Mail Code:

Lyndon B. Johnson Space Center
White Sands Test Facility
Post Office Box 20
Las Cruces, NM 88004-0020



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

NEW MEXICO ENVIRONMENT DEPARTMENT
ATTN MR DOUG HOPINKAH LEAD INSPECTOR
HAZARDOUS WASTE BUREAU DISTRICT 1
COMPLIANCE AND TECHNICAL ASSISTANCE PROGRAM
5500 SAN ANTONIO DRIVE NE
ALBUQUERQUE NM 87109

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Handwritten Signature]

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

CA MONTAÑEZ

C. Date of Delivery

5-11-07

D. Is delivery address different from item 1?

- ☐ Yes

If YES, enter delivery address below:

- ☐ No

3. Service Type

- ☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

- ☐ Yes

2. 7004 1350 0004 1033 5512